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SAMSUNG SDI BRASIL LTDA.,
SHENZHEN SAMSUNG SDI CO., LTD. and
TIANJIN SAMSUNG SDI CO., LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 07-5944 SC

MDL No. 1917

This Document Relates to:

*Sharp Electronics Corp., et al. v. Hitachi Ltd.,
et al.*, No. 13-cv-1173;

*Sharp Elecs. Corp. v. Koninklijke Philips
Elecs. N.V.*, No. 13-cv-02776;

Siegel v. Hitachi, Ltd., No. 11-cv-05502;

Siegel v. Technicolor SA, et al., No. 13-cv-
05261;

**DECLARATION OF HELEN C. ECKERT
IN SUPPORT OF SDI DEFENDANTS'
ADMINISTRATIVE MOTION TO SEAL
DOCUMENTS PURSUANT TO CIVIL
LOCAL RULES 7-11 AND 79-5**

**[RE REPLY IN SUPPORT OF SDI'S MIL
NO. 1]**

1 *Best Buy Co., et al. v. Hitachi, Ltd., et al.,*
2 No. 11-cv-05513;

3 *Best Buy Co., et al. v. Technicolor SA, et al.,*
4 No. 13-cv-05264;

5 *Target Corp. v. Chunghwa Picture Tubes,*
6 *Ltd., et al.,* No. 11-cv-05514;

7 *Target Corp. v. Technicolor SA, et al.,* No. 13-
8 cv-05686;

9 *Sears, Roebuck and Co. and Kmart Corp. v.*
10 *Chunghwa Picture Tubes, Ltd.,* No. 11-cv-
11 05514;

12 *Sears, Roebuck and Co. and Kmart Corp. v.*
13 *Technicolor SA,* No. 13-cv-05262;

14 *Viewsonic Corp. v. Chunghwa Picture Tubes,*
15 *Ltd.* No. 14-cv-02510.

1 I, Helen C. Eckert, declare as follows:

2 1. I am an associate at the law firm of Sheppard Mullin Richter & Hampton LLP,
3 counsel of record for Defendants Samsung SDI America, Inc.; Samsung SDI Co., Ltd.; Samsung
4 SDI (Malaysia) SDN. Bhd.; Samsung SDI Mexico S.A. De C.V.; Samsung SDI Brasil Ltda.;
5 Shenzhen Samsung SDI Co., Ltd.; and Tianjin Samsung SDI Co., Ltd. (collectively, "SDI"). I
6 submit this declaration pursuant to Civil Local Rule 79-5(d) to establish that the document
7 containing "Confidential" information pursuant to the Stipulated Protective Order entered on June
8 18, 2008 (Dkt. No. 306) and submitted to the Court in connection with SDI's Reply Brief In
9 Support Of Its Motion *In Limine* To Prohibit Plaintiffs From Conflating SDI With Non-Parties,
10 Including But Not Limited To Samsung Electronics Co., Ltd. ("Reply iso SDI's MIL No. 1") is
11 sealable. Except for those matters stated on information and belief, about which I am informed
12 and which I believe to be true, I have personal knowledge of the matters set forth herein and could
13 and would testify competently to each of them.

14 2. The parties have disclosed or produced in this action certain documents and
15 information designated as either "Confidential" or "Highly Confidential" pursuant to the
16 Stipulated Protective Order entered on June 18, 2008 (Dkt. No. 306).

17 3. On March 6,, 2015, SDI filed an Administrative Motion to Seal and lodged the
18 following document pursuant to Civil Local Rules 7-11 and 79-5(d) and (e):

19 a. Exhibits A of the Declaration of James L. McGinnis in Support of Reply iso
20 SDI's MIL No. 1 ("Exhibit A").

21 4. Exhibit A is a certified translation of SDCRT-0005946 through SDCRT-0005948,
22 which was produced in this case by SDI and designated "Confidential" pursuant to the Protective
23 Order. Exhibit A is an internal SDI email reporting in detail on the status of sensitive sales
24 negotiations with customers, and reveals confidential information relating to pricing, capacity,
25 material costs, and manufacturing methods. I am informed and believe that SDI treats such
26 information as highly confidential and has taken reasonable measures to safeguard it from
27 disclosure outside the company. I am informed and believe that public disclosure of this highly
28 sensitive information presents a risk of undermining SDI's business relationships, causing SDI

1 harm with respect to its customers and/or competitors, and/or competitively disadvantaging SDI.
2 Accordingly, Exhibit A should be maintained under seal.

3
4 I declare under penalty of perjury under the laws of the United States of America
5 that the foregoing is true and correct.

6 Executed this 6th day of March 2015 in Los Angeles, California.

7
8 /s/ Helen C. Eckert

9 Helen C. Eckert
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